

ORIGINAL

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

CRYSTAL TRAWICK,

Plaintiff,

vs.

CASE NO. 4:16-CV-380

CARMIKE CINEMAS, LLC.,

Defendant.

_____ /

SPECIAL INTERROGATORIES TO THE JURY AND VERDICT

Section I: Equal Pay Act Claim

Do you find from a preponderance of the evidence:

1. That Carmike Cinemas paid Crystal Trawick a lower wage than a male employee for equal work on jobs requiring substantially equal skill, effort and responsibility under similar working conditions?

Answer Yes or No No

*If your answer is "No," go to Section II.
If your answer is "Yes," go to the next question.*

2. That the lower wage Carmike Cinemas paid to Crystal Trawick was the result of a legitimate factor other than Crystal Trawick's sex?

Answer Yes or No _____

*If your answer is "Yes," go to Section II.
If your answer is "No," go to the next question.*

3. That Carmike Cinemas either knew or showed reckless disregard for whether its conduct was prohibited by the Equal Pay Act?

Answer Yes or No _____

Go to the next question.

4. That Crystal Trawick should be awarded damages for lost compensation?

Answer Yes or No _____

Go to Section II.

Section II: Title VII Wage Discrimination Claim

Do you find from a preponderance of the evidence:

5. That Carmike Cinemas paid Crystal Trawick lower compensation than a similarly situated male employee and that Carmike Cinemas used Crystal Trawick's sex as a motivating factor when it made decisions regarding Crystal Trawick's compensation?

Answer Yes or No Yes

*If your answer is "No," go to Section III.
If your answer is "Yes," go to the next question.*

6. That Carmike Cinemas would have set Crystal Trawick's compensation as it did even if Carmike Cinemas had not taken Crystal Trawick's sex into account?

Answer Yes or No NO

*If your answer is "Yes," go to Section III.
If your answer is "No," go to the next question.*

7. That Crystal Trawick should be awarded back pay damages to compensate for a net loss of wages and benefits?

Answer Yes or No Yes

Go to the next question.

8. That Crystal Trawick should be awarded damages to compensate for emotional pain and mental anguish caused by Carmike's violation of Title VII regarding Crystal Trawick's pay?

Answer Yes or No Yes

Go to Section III.

Section III: Retaliation Claim

Do you find from a preponderance of the evidence:

9. That Carmike Cinemas unlawfully retaliated against Crystal Trawick by terminating her employment because she engaged in protected activity?

Answer Yes or No NO

*If your answer is "No," go to Section IV.
If your answer is "Yes," go to the next question.*

10. That Crystal Trawick suffered damages because her employment was terminated?

Answer Yes or No _____

Go to the next question.

11. That Crystal Trawick should be awarded damages to compensate for a net loss of wages and benefits from the date of the termination of her employment to the date of your verdict?

Answer Yes or No _____

Go to the next question.

12. That Crystal Trawick should be awarded damages to compensate for emotional pain and mental anguish caused by Carmike Cinemas' violation of Title VII regarding its termination of her employment?

Answer Yes or No _____

Go to the next question.

13. That Crystal Trawick should be awarded front pay from the date of your verdict into the future?

Answer Yes or No _____

Go to Section IV.

Section IV: Verdict

____ We, the jury, find in favor of Defendant Carmike Cinemas LLC on all of Plaintiff Crystal Trawick's claims.

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____ We, the jury, having found in favor of Plaintiff Crystal Trawick on one or more of her claims, award her damages against Defendant Carmike Cinemas LLC as follows:

67,117.79 as damages for lost pay to date of verdict.

100,000 as damages for emotional pain and mental anguish.


0 as damages for future lost pay from date of verdict.

1,000,000 as punitive damages.

SO SAY WE ALL.

DATE:

9-17-2019


Foreperson's Signature
